



## REMARKS

Applicants respectfully traverse and request reconsideration.

In response to the Examiner's Restriction/Election requirement, Applicants herein cancel claims 10-11, 13-16, 18-20 and 24-27 as these are drawn to a non-elected invention. Applicants maintain the traverse of the restriction/election requirement but cancel the claims herein for the advancement of the present Application.

Applicants herein amend the title of the present Application. The Examiner has noted the title as being non-descriptive and Applicants submit the amended title seeks to satisfy the Examiner's request. As such, Applicants request entrance of the amended title.

Applicants submit amended claims 1, 17 and 21. It is submitted these claim amendments are proper as the limitations amended are within the originally filed specification and do not add any new subject matter.

Claims 1-9, 12 and 17 current stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,236,568 ("Lai"). Applicants traverse and request reconsideration.

As understood, Lai is directed to, among other things, a heat-dissipating structure for an integrated circuit using an IC 3, flexible adhesive layer 6, a buffer pad 5 and a heat conductive piece 4. Based on the disclosed structure of Lai, using the buffer pad 5 allows for reduction in thermal compressive stress load. FIG. 2 clearly illustrates the structure of the conductive piece 4 providing an exterior outlet for any dissipating heat. Furthermore, paragraph 36 succinctly delineates the heat dissipating flow of integrated circuit chip 3 to the flex adhesive layer 6 to the buffer pad 5 and the heat conductive piece 4. While Lai discloses an encapsulant 9, the encapsulant does not encapsulate the heat sink, but rather only encapsulates the other elements, as the Lai system teaches the conductive piece 4 being exposed to atmosphere for heat dissipation.

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Claims 1 and 17 recites, among other things, "an external epoxy molding material disposed exterior to the metallic heat sink such that the metallic heat sink, the second substrate and the first substrate are encapsulated by the external epoxy molding material." It is submitted that Lai fails to disclose the external epoxy molding material disposed exterior to the metallic heat sink such that epoxy molding material encapsulates the metallic heat sink. As discussed above, the encapsulant 9 of Lai fails to encapsulate the metallic heat sink and specifically teaches away from this limitation as the conductive piece 4 is external to atmosphere to allow heat dissipation. The claimed present invention operates in completely different manner and produces a completely different result than the teachings of Lai.

Therefore, it is submitted that Lai fails to disclose all of the claimed limitations of claims 1 and 17. As such, reconsideration and withdrawal are respectfully requested. Should the Examiner maintain the present rejection, Applicants request a showing of where Lai teaches the claimed external epoxy molding material.

Regarding claims 3-9 and 12, Applicants respectfully resubmit the above position offered with regards to claims 1 and submit that these claims contain further patentable subject matter in view of Lai and allowable not merely as being dependent upon an allowable base claim. As such, reconsideration and withdrawal are respectfully requested.

Claims 21-23 stand rejected under 35 U.S.C. 103(a) as being unpatentable in view of Lai. Applicants respectfully traverse and request reconsideration. As claim 22 is herein cancelled, without prejudice, it is submitted the rejection of claim 22 is no longer proper.

Applicants resubmit the above position offered regarding claims 1 and 17. It is further submitted that one of ordinary skill in the art would not have fabricated an integrated circuit including the epoxy molding material, as claimed in claim 21 because Lai teaches a completely different system operating in a completely different manner. As Lai teaches the encapsulant 9 to the sides of the internal elements and the conductive piece 4 specifically adjacent to atmosphere, Lai succinctly teaches away from the claimed method of fabrication. Moreover, claim 23 contains further patentable subject matter and is allowable not merely as being dependent upon an allowable base claim. As such, reconsideration and withdrawal of the present rejection of claims 21 and 23 is requested. Should the Examiner maintain the present rejection, Applicants request a showing of where Lai teaches the claimed external epoxy molding material and how

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this would obviously provide for one of ordinary skill in the art to fabricate an integrated circuit in accordance as claimed the claimed present invention.

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Accordingly, Applicant respectfully submits that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

By: 

Timothy J. Bechen  
Registration No. 48,126

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VEDDER, PRICE, KAUFMAN &  
KAMMHOLZ  
222 N. LaSalle Street  
Chicago, IL 60601  
(312) 609-7500  
FAX: (312) 609-5005